

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)

Amendment of Section 73.202(b))

Table of Allotments)

FM Broadcast Station)

(San Saba, Texas & Mullin, Texas))

MB Docket No. _____

RM- _____

Accepted / Filed

OCT - 4 2016

Federal Communications Commission
Office of the Secretary

To: Marlene Dortch, Secretary
Federal Communications Commission
Attn: Audio Division, Media Bureau

DOCKET FILE COPY ORIGINAL

PETITION FOR RULE MAKING

Comes Roy E. Henderson ("Petitioner"), by Counsel and pursuant to Sections 1.401 and 1.420 of the Commission's Rules, and hereby requests that the Commission institute a rulemaking proceeding to amend Section 73.202(b) of the Commission's Rules, the Table of Allotments. This instant Petition for Rule Making has been previously (electronically) filed with application BPH-20160601ABG for Radio Station KNUZ (FM), San Saba, Texas (FAC# 65315).

At the Request of FCC staff member Ms. Adrienne Denysky, the Petitioner is submitting this instant Petition for Rule Making now thru the Office of the Secretary. Attached hereto is said Petition for Rule Making (See Attachment 1) and said document is incorporated with this instant Petition for Rule Making submission.

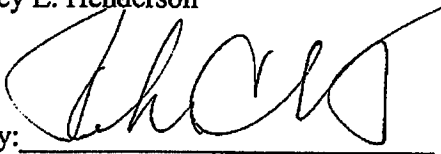
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MB-Audio 16-6

Petitioner respectfully urges the Commission to issue a Notice of Proposed Rulemaking for the proposed changes herein.

Respectfully submitted,

Rey E. Henderson

By: 

John C. Trent, Esquire
It's Counsel

October 4, 2016

Putbrese Hunsaker & Trent, P.C.
200 S. Church Street
Woodstock VA 22664

Attachment 1

Petition for Rule Making

Petition for Rule Making
To Substitute Channel 224 A for 291A
San Saba, Texas
July 2016

This Petition For Rule Making is being filed by Roy E. Henderson, Licensee, KNUZ, San Saba, TX. Henderson hereby requests a lateral, non-adjacent channel change for KNUZ.

In order for KNUZ to relocate to from Channel 291A to Channel 224A, the vacant allotment at Mullin, TX needs to be changed from Channel 224A to Channel 277A. The new Mullin channel is on an IF channel of the present allotment and is unusable to anyone else in Mullin.

KNUZ currently is a 3 KW Class A station operating with a HAAT of 6 meters. At the new allocation reference, a full 6 KW Class A station is requested. International concurrence is also requested. The allocation reference for the new channel is: 31 12 59 N and 98 48 55 West.

The allocation at Mullin, TX is not yet built. The Mullin allocation reference for Channel 277A is 31 35 00 N, 98 40 31 W. The new substitute channel will continue to provide city grade service to all of Mullin, TX.

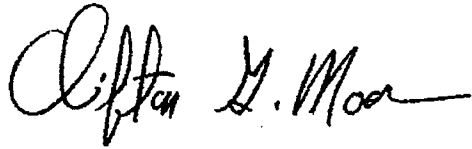
<u>City</u>	<u>Present</u>	<u>Proposed</u>
San Saba, TX	291A	224A
Mullin, TX	224A	277A

One reason for this proposed change of the FM Table of Allotments is to allow KNUZ to relocate to a taller tower and have a greater power (as a Class A). The licensed KNUZ serves 592 SQ KM of land area. The maximum facility from the allocation reference will serve 2,514 SQ KM. This is an increase of 325%.

The population served by KNUZ on Channel 224 from the allocation reference site increases from 4,192 persons to 5,733 persons. This represents a population increase of 36.7%

Because this proposed channel change greatly increases the size of the potential KNUZ broadcast area and population served, it is thought that this proposal is in the public interest. Allocation printouts and coverage maps follow this narrative.

All information in this Rule Making Request is sworn to be accurate to the knowledge of the
Undersigned:

A handwritten signature in black ink, appearing to read "Clifton G. Moor". The signature is fluid and cursive, with a horizontal line extending from the end of the name.

July 12, 2016

Clifton G. Moor
Bromo Communications, Inc.

§73.207 Allocation Study from Reference Site

KNUZ (FM)

Channel 224A - 92.7 MHz

6 kW ERP - 23 m HAAT

San Saba, Texas

May 2016

Searching from Reference Site

REFERENCE

31 12 59.0 N.

98 48 55.0 W.

CLASS = A Int = A
Current Spacings to 3rd Adj.

Channel 224 - 92.7 MHz

DISPLAY DATES

DATA 05-20-16

SEARCH 05-20-16

Call	Channel	Location		Azi	Dist	FCC	Margin	
*DKFON%	VAC	224A	Mullin	TX	20.1	47.81	114.5	-66.7
KGSR	LIC	227C	Cedar Park	TX	124.5	95.75	94.5	1.3
KMWX	LIC	223C2	Abilene	TX	328.2	138.76	105.5	33.3
KDCD	LIC	225C1	San Angelo	TX	278.8	168.66	132.5	36.2
KRMX	LIC	225C2	Marlin	TX	81.4	154.24	105.5	48.7

* It is proposed to move the allocation at Mullin, TX to I.F. Channel 277A and a new site that will still adequately provide a city grade signal over Mullin.

Reference station has protected zone issue: Mexico

% = Station fails 73.215.

All separation margins include rounding

Bromo Communications, Inc.

§73.207 Allocation Study from Proposed New Reference Site **Vacant Allocation**

Channel 277A – 103.3 MHz

Mullin, Texas

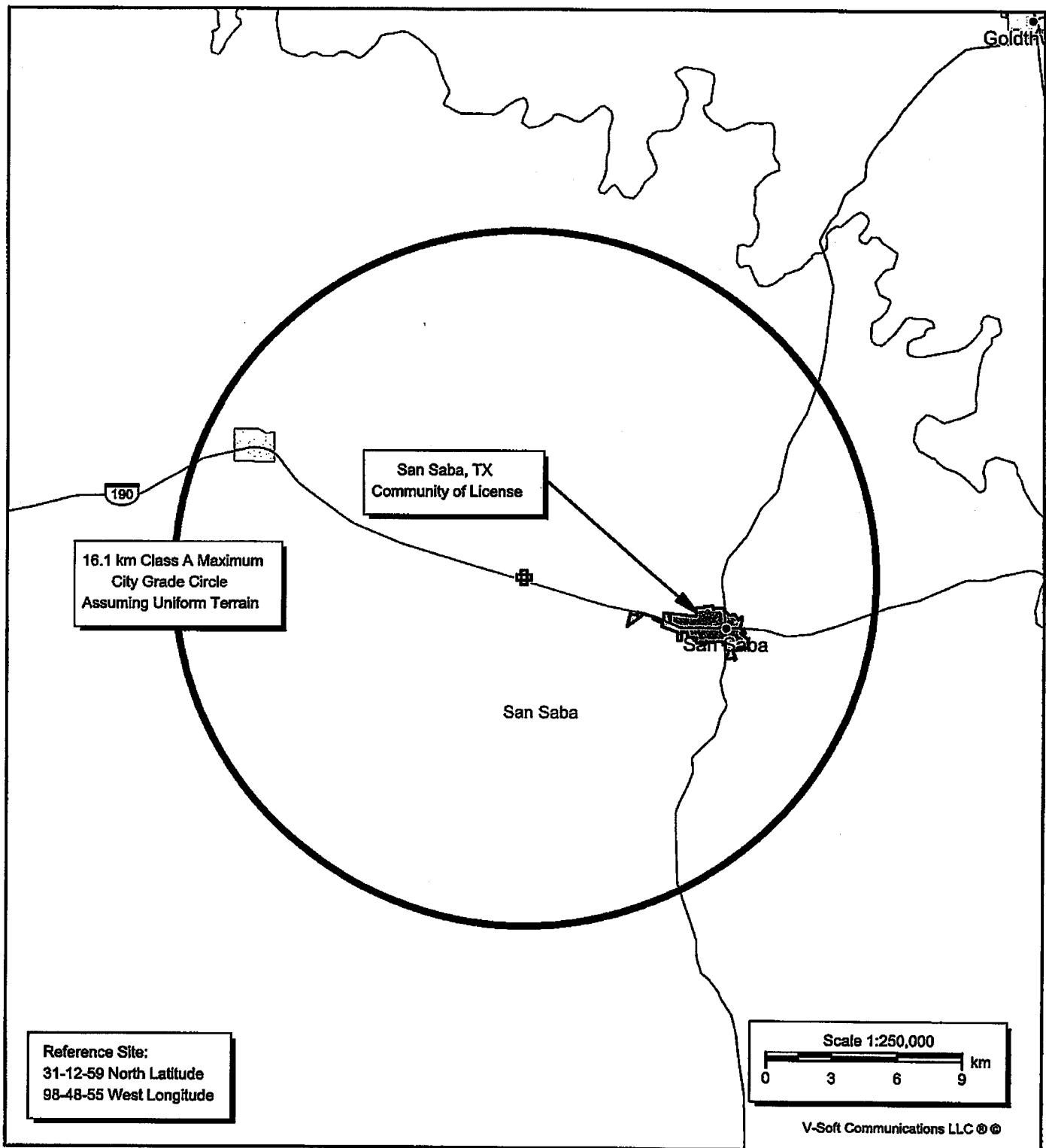
May 2016

Searching from Proposed New Reference Site

REFERENCE						DISPLAY DATES		
31 35 00.0 N.		CLASS = A Int = AA				DATA	05-25-16	
98 40 31.0 W.		Current Spacings to 3rd Adj.				SEARCH	05-25-16	
----- Channel 277 - 103.3 MHz -----								
Call	Channel	Location		Azi	Dist	FCC	Margin	
DKFON	VAC	224A	Mullin	TX	37.1	5.26	9.5	-4.2
KSSM	LIC-N	276C3	Copperas Cove	TX	128.5	88.64	88.5	0.14
NEW	CP -N	280A	Comanche	TX	346.8	30.94	30.5	0.44
KKCN	LIC	276C1	Ballinger	TX	274.1	134.59	132.5	2.1
KWBU-FM	LIC-N	277A	Waco	TX	92.8	140.71	114.5	26.2
AU7057574	VAC	277C3	Junction	TX	219.0	171.20	141.5	29.7
KBPA	LIC	278C0	San Marcos	TX	155.9	186.73	151.5	35.2

All separation margins include rounding

Bromo Communications, Inc.



Community Coverage from Reference Site

KNUZ (FM)

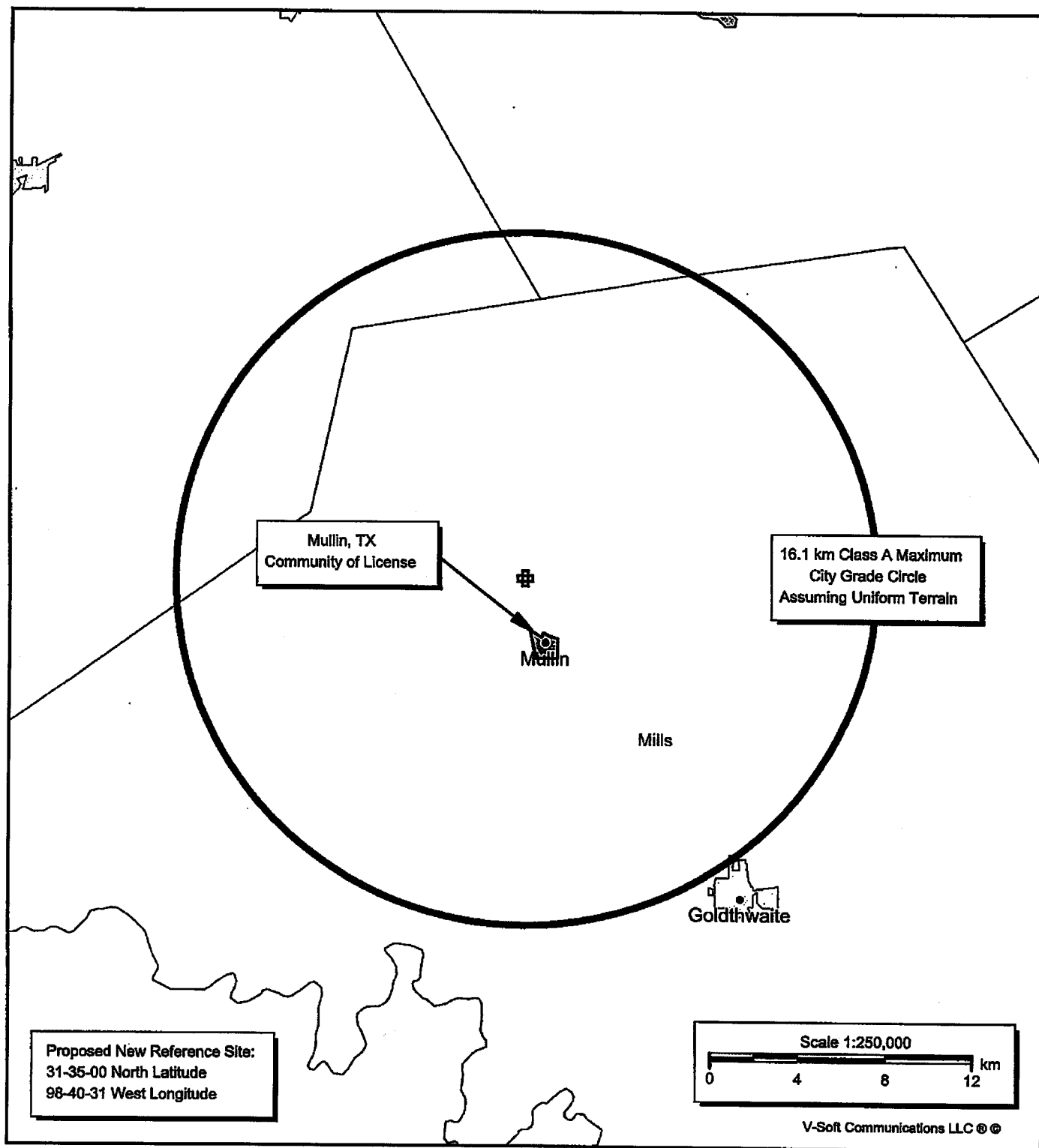
Channel 224A - 92.7 MHz

6 kW ERP - 23 m HAAT

San Saba, Texas

Bromo Communications, Inc.

May 2016



Community Coverage from Proposed New Reference Site
Vacant Allocation
Channel 277A - 103.3 MHz
Mullin, Texas

Bromo Communications, Inc.

May 2016